

To: LG&E-KU DSM team members

Re: Requesting delay of DSM filing

November 10, 2022

At the previous meeting of the LG&E-KU DSM Advisory Committee we were informed that the Companies intend to file their new DSM plan with the PSC by the end of December. We are writing to request that this filing be delayed, for the following reasons.

1. The plans which have been shared with the Advisory Group still lack substantial detail, leaving us very unclear about the specifics of the many programs that have been evaluated.
2. The inputs and assumptions underlying the DSM Cost Tests remain unknown to us, despite the fact that the advisory committee has requested this information, including in a written request submitted by multiple committee members on September 15, 2022. We have therefore been unable to independently review these Cost Tests and engage in a meaningful dialogue about how these tests were performed.
3. Regarding Energy Efficiency Financing programs, such as the Pay As You Save model, which the Commission directed LG&E-KU to evaluate in their most recent rate case, we have seen no analysis nor been engaged in any meaningful discussion.
4. The incentives now available through the Inflation Reduction Act have direct implications for many DSM programs, but were so recently passed into law that they could not have been fully accounted for in the DSM planning to-date. Additional time should be taken to incorporate the IRA incentives into the DSM plan, so these major incentives can be leveraged to the maximum benefit for your customers.
5. LG&E-KU have recently announced their intention to file for permission to build two new NGCC gas plants. We believe that further analysis of DSM options is required to maximize the opportunities for avoiding these new investments in fossil fuel generation – investments which ratepayers will pay for and which entail the risk of becoming stranded assets.

As we stated in our previous letter, we wish to play an active and constructive role in expanding LG&E-KU's DSM programs, but that effort will be cut short if the Companies proceed with filing their DSM plan in December. Thank you for your attention to our concerns.

Sincerely,

Apogee-Climate & Energy Transitions

Cathy Hinko

Housing and Homeless Coalition of Kentucky

Kentucky Conservation Committee
Kentuckians For The Commonwealth
Kentucky Interfaith Power & Light
Kentucky Resources Council
Kentucky Solar Energy Society
Louisville Metro Government
Mountain Association
Renewable Energy Alliance of Louisville